

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

IN RE:)
)
MS GRAND, INC.) **Case No. 11-10200-RGM**
) **(Chapter 11)**
Debtor)

**NOTICE OF TRANSFER OF CLAIMS OF WILEY REIN LLP TO YEON K. HAN, KI
YOON, SUN KYUNG LIM, JAMES Y. SOHN, GRAND INVESTMENT, LLC AND
CHUNG LIM SHIN PURSUANT TO FED. R. BANKR. P. 3001**

Yeon K. Han, Ki Yoon, Sun Kyung Lim, James Y. Sohn, Grand Investment, LLC and Chung Lim Shin (collectively “Transferee”), by and through counsel, hereby files this Notice of Transfer of Claim (Proof of Claim 38-1) to Transferee pursuant to Fed. R. Bankr. P. 3001, and in support states:

The Claims

1. On February 22, 2011, Wiley Rein LLP (“WR”) timely filed its proof of claim in this case: Proof of Claim No. 38 as an unsecured non-priority proof of claim in the amount of \$26,981.11 (the “Claim”). A Copy of the Claim is attached hereto as Exhibit 1.

Jurisdiction and Venue

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory grounds for the relief requested in this Motion are 11 U.S.C. § 105 and Fed. R. Bankr. P. 3001.

Thomas W. Repczynski, Esq.
Offit Kurman, P.C.
8300 Boone Boulevard, Suite 500
Vienna, VA 22182
(703) 745-1801
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Counsel for Transferee

NOTICE IS HEREBY GIVEN THAT THE CLAIM SHALL BE TRANSFERRED TO YEON K. HAN, KI YOON, SUN KYUNG LIM, JAMES Y. SOHN, GRAND INVESTMENT, LLC AND CHUNG LIM SHIN (TO THE EXTENT DISTRIBUTIONS ARE MADE FROM THIS ESTATE). NO ACTION IS REQUIRED IF YOU DO NOT OBJECT TO THE TRANSFER OF THE CLAIM. IF YOU OBJECT TO THE TRANSFER, YOU MUST FILE A WRITTEN OBJECTION WITHIN TWENTY-ONE (21) DAYS AFTER THE DATE OF THIS NOTICE.

Date: July 23, 2012

Respectfully submitted,

OFFIT KURMAN, P.A.

By: _____/s/ _____
Thomas W. Repczynski, Esq., VSB No. 39967
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8300 Boone Boulevard, Suite 500
Vienna, VA 22182
(703) 745-1801
(703) 745-1835 (fax)
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CERTIFICATE OF SERVICE

The following parties received electronic notice of this filing:

Linda Dianne Regenhardt	lregenhardt@garylaw.usm
Joseph A. Guzinski	joseph.a.guzinski@usdoj.gov
Michael Tully Driscoll	michael.driscoll@usdoj.gov
Bradford F. Englander	benglander@wtplaw.com

To the extent that the following persons were not served electronically via CM/ECF system, a copy of the **Notice of Transfer of Claim Pursuant to Fed. R. Bankr. P. 3001** was first class mailed, postage prepaid, this 23rd day of July, 2012, to:

MS Grand, Inc. 4800 Walden lane Lanham, MD 20706 <i>Debtor</i>	Joseph A. Guzinski, Esq. Michael Tully Driscoll, Esq. Office of the U.S. Trustee 115 South Union Street Alexandria, VA 22314
Linda Dianne Regenhardt, Esq. Gary Regenhardt Goldstein Wade PC 8500 Leesburg Pike, Suite 400 Vienna, VA 22182-2409 <i>Counsel for Debtor</i>	Bradford Englander, Esq. Whiteford Taylor & Preston, LLP Suite 300 3190 Fairview Park Drive Falls Church, VA 22042
U.S. Trustee W. Clarkson McDow, Jr. Office of the U.S. Trustee 115 South Union Street Alexandria, VA 22314	Rebecca L. Saitta, Esq. Wiley Rein LLP 7925 Jones Branch Drive, Suite 6200 McLean, VA 22102

By: _____/s/ _____
Thomas W. Repczynski, Esq.

EXHIBIT 1

B 10 (Official Form 10) (04/10)

UNITED STATES BANKRUPTCY COURT <u>EASTERN</u> DISTRICT OF <u>VIRGINIA</u>		PROOF OF CLAIM
Name of Debtor: MS Grand, Inc.		Case Number: 11-10200-RGM
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): Wiley Rein LLP		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent: Rebecca L. Saitta, Wiley Rein LLP 7925 Jones Branch Drive, Suite 6200 McLean, Virginia 22102		Court Claim Number: _____ (If known)
Telephone number: (703) 905-2800		Filed on: _____
Name and address where payment should be sent (if different from above):		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.
Telephone number:		<input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: \$ 26,981.11*		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.
If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.		
If all or part of your claim is entitled to priority, complete item 5.		
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.		
2. Basis for Claim: Legal fees (See instruction #2 on reverse side.)		Specify the priority of the claim.
3. Last four digits of any number by which creditor identifies debtor: _____		<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).
3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		<input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. §507 (a)(4).
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.		<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5).
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe:		<input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7).
Value of Property: \$ _____ Annual Interest Rate _____ %		<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8).
Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____		<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a)(____).
Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		Amount entitled to priority: \$ _____
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)		
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.		
If the documents are not available, please explain:		
Date: 2/22/11	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	
Rebecca L. Saitta, attorney for Wiley Rein LLP <i>Rebecca L. Saitta</i>		FOR COURT USE ONLY

Date:
2/22/11

Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.

FOR COURT USE ONLY

Rebecca L. Saitta, attorney for Wiley, Rein LLP

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 2511.

*plus interest, attorneys' fees and costs

Wiley Rein LLP
MS Grand, Inc.
Bill and Payment Report

Matter:

Kimberly Lee v. Kang, et al. (United States District Court, Eastern District of Virginia)

1/31/09	Invoice	\$26,000
1/31/09	Payment	(\$25,000)
11/16/09	Payment	(\$1,000)
2/17/09	Invoice	\$20,338.46
11/16/09	Payment	<u>(\$4,000)</u>
Balance		\$16,338.46

Matter:

Guttman v. MS Grand, Inc. (United States Bankruptcy Court, District of Maryland)

1/31/09	Invoice	\$3,791.50
2/17/09	Payment	(\$7,500.00)
3/11/09	Invoice	\$8,840.63
4/13/09	Invoice	\$3,680.00
5/13/09	Invoice	\$1,549.02
6/12/09	Invoice	<u>\$ 281.50</u>
Balance		\$10,642.65

TOTAL BALANCE DUE: \$26,981.11 plus interest, attorneys' fees and costs.